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**BY ECF**

Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Jack Norton v. The City of New York et al., 21-CV-4884 (FB) (JRC)

Your Honor:

I write jointly with Defendants' counsel to respectfully request that the Court extend Plaintiff's deadline to serve and file Plaintiff's application for attorney's fees and costs, if necessary, by 45 days—from December 16, 2022, until January 31, 2023.

By way of background, on October 21, 2022, the parties advised the Court the Plaintiff had accepted defendants' Rule 68 Offer of Judgment (ECF No. 39). Further, on October 21, 2022, the Court extended Plaintiff's deadline to move for attorney's fees and costs to December 16, 2022 (*See* Docket Entry Dated October 21, 2022). Plaintiff has served Defendants with his settlement demand regarding attorney's fees and costs, and Defendants are currently in the process of reviewing the demand and obtaining settlement authority accordingly. However, Defendants have not yet been able to obtain authority, and will not be able to do so prior to Plaintiff's current deadline to move for attorney's fees and costs. As such, in order to allow the parties time to fully explore the possibility of settling attorney's fees and costs, and considering the upcoming holidays, the parties respectfully request a 45-day extension of Plaintiff's deadline to file a motion for attorney's fees and costs—from December 16, 2022, to January 31, 2023.

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver